

EXHIBIT A:
SUMMONS AND COMPLAINT

FILED
01-07-2021
John Barrett
Clerk of Circuit Court
2021CV000096
Honorable Kevin E.
Martens-27
Branch 27

STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY

ALARIC J GREENLEE,
3714 N 42nd St.
Milwaukee, WI 53216

Plaintiff,

Case No.: 2021CVxxxxx

Case Code: 30107

Case Type: Personal Injury

v.

SPEEDWAY LLC,
500 Speedway Drive
Enon, OH 45323-1056

And

SPEEDWAY LLC,
C T CORPORATION SYSTEM
301 S. Bedford Street, Suite 1
Madison, Wisconsin 53703

Defendants(s).

SUMMONS

STATE OF WISCONSIN, TO EACH PERSON NAMED ABOVE AS A DEFENDANT:

YOU ARE HEREBY NOTIFIED that the plaintiff named above has filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature and basis of the legal action.

Within twenty (20) days of receiving this Summons, you must respond with a written Answer to the Complaint, as that term is used in Chapter 802 of the Wisconsin Statutes. The court may reject or disregard an Answer that does not follow the requirements of the statutes. The Answer must be sent or delivered to the Court at:

Clerk of Circuit Court,
Milwaukee County Courthouse,
901 N Ninth Street, Milwaukee, WI 53233

and to

OS MIRZA LAW, LLC, plaintiff's attorney, whose address is below. You may have an attorney help or represent you.

If you do not provide a proper Answer within twenty (20) days, the Court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against real estate you own now or in the future and may also be enforced by garnishment or seizure of property.

Dated this 7th day of January 2021.

OS MIRZA LAW, LLC
Attorneys for Plaintiff



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COMPLAINT

NOW COMES the above-named plaintiff, Alaric J. Greenlee (hereinafter "Greenlee"), by his attorney, Osman A. Mirza of OS MIRZA LAW, LLC, and as for a claim of personal injury pursuant to Wis. Stat. § 893.54 against the defendant(s), Speedway LLC (hereinafter "Speedway"), alleges and shows to the court as follows:

1. Plaintiff, Greenlee, is an adult natural person residing at 3714 N 42nd Street, Milwaukee, WI 5316, in Milwaukee County, Wisconsin.
2. Upon information and belief, at all of the times hereinafter mentioned, the defendant(s), Speedway LLC (hereinafter "Speedway"), was and now is a foreign limited liability

corporation, organized under the laws of the State of Delaware, with its principal office located at 500 Speedway Drive, Enon, Ohio 45323, and is engaged in retail business, and owns and operates, among others, the Speedway store (hereinafter “store”) located at 3102 S. Chicago Avenue, in the City and County of Milwaukee, Wisconsin.

3. Upon information and belief, at all of the times hereinafter mentioned, the defendant, Speedway LLC, was and is now a domestic business in the State of Wisconsin, whose registered agent is C T CORPORATION SYSTEM located at 301 S. Bedford Street, Suite 1, Madison, Wisconsin 53703, and is engaged in retail business, and owns and operates, among others, the Speedway store (hereinafter “store”) located at 3102 S. Chicago Avenue, in the City and County of Milwaukee, Wisconsin.
4. On or about January 9, 2018, the plaintiff, while proceeding through the store, slipped and fell and was greatly injured by reason of the defendant(s), their agent(s), servant(s), and/or employees(s) failure to properly maintain the exterior walkways on the premises of the store; the walkway was then and there improperly maintained as a substantial amount of ice formed from water flowing by and through operation of the store car wash; said ice was present for a substantial period of time and without warning of foreseeable danger; that by reason of the failure to properly maintain said premises walkways, the plaintiff sustained the injuries hereinafter set forth; the defendant(s), their agent(s), servant(s), and/or employees(s) knew or should have known of the unsafe condition and/or danger of said premises walkways for a substantial period of time and had ample opportunity to remedy it.
5. At the time of said injuries, the plaintiff, was in the exercise of due care for his own safety.

6. Any injuries sustained by the plaintiff and the incident causing the same were directly and proximately caused by the carelessness and negligence of the defendant(s), their agent(s), servant(s), and/or employees(s).
7. As a proximate result of the fall, the plaintiff was seriously injured and sustained a severe musculoskeletal injury to his left knee resulting in swelling, stiffness, tenderness around the patella bone, patellar degenerative spurring, joint effusion, restricted movements when flexing and extending said knee, and limited range of motion due to pain; that plaintiff's injuries necessitated cool compression for inflammation, a knee brace, pain medication, physical therapy and rehabilitation for an extended period.
8. Upon information and belief, plaintiff was permanently injured; that arthritic and stable degenerative changes were visualized by radiology despite the lack of acute fracture, dislocation; that arthritic changes in said knee are permanent and associated with pain; that plaintiff was subsequently diagnosed with pain progressed to his left ankle and joints of the left foot; that referral for orthopedic surgeon is anticipated for persistent pain; that plaintiff was and will be obligated to expend monies for medical care and attendants; that plaintiff suffered and will suffer great pain of body and mind; that plaintiff's ability to enjoy life was and will be substantially impaired, all to his damage in an amount to be set by the trier of fact.
9. Plaintiff claims damages including but not limited to loss due to injuries to person and/or property, lost wages, damages, costs, loss of services, expenses, and compensation for or on account of any damages.

10. Upon information and belief, the Involuntary Plaintiff, Milwaukee Transport Services, Inc., paid a portion of the medical bills incurred by the Plaintiff, and is entitled to reimbursement and/or subrogation under the laws of the State of Wisconsin.

Dated this 7th day of January 2021.

OS MIRZA LAW, LLC
Attorneys for Plaintiff



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